



PRIVACY POLICY

Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

LEGAL BASIS AND PURPOSE OF THE PROCESSING

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018 and we are responsible as 'controller' of that personal information for the purposes of those laws. The legal basis is represented by a contract (art. 6 comma 1 point b GDPR) or by legal requirement (art. 6 comma 1 point c GDPR).

PERSONAL INFORMATION WE COLLECT AND HOLD ABOUT YOU

We may collect and use the following personal information about you:

- your name and contact information, including address, email address and telephone numbers
- your identification and other documentation (such as passport, ID card, proof of address)
- information about how you use our website, IT, communication and other systems
- details of your attendance at any of our events
- Cookies in order to get a better understanding of the use of our website
- Contact details to facilitate or establish any relationship with you
- Any other information that may identify you that you have voluntarily provided to us

This personal information is required to provide services or items to you or to receive services or items from you. If you do not provide personal information we ask for, it may delay or prevent us from providing or obtaining items and/or services to you.

HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect most of this personal information directly from you in person, by telephone, email and/or via our website. However, we may also collect information:

- from cookies on our website
- various professional online sources, such as LinkedIn or other professional organisations

Data Protection Administrator Raffaele Marco Bagnato info@upnec.eu



PRIVACY POLICY

HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under data protection law, we can only use your personal information if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations
- for the performance of our contract with you or to take steps at your request before entering into a contract with you
- for our legitimate interests or those of a third party, or
- where you have given consent

A legitimate interest is when we have an association reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We routinely share personal information with:

- other third parties we use to help us run our business, for example, website hosts or administrative/audit functions;

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and/or to you. We may also share personal information with external auditors for accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

WHERE YOUR PERSONAL INFORMATION IS HELD

Information may be held at our association, third party agencies, service providers.

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: 'Transferring your personal information out of the EEA'.

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your personal information while we are providing artwork and services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.



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We will not retain your personal information for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of personal information, we keep provenance records or artworks indefinitely to prevent forgeries and preserve the value of artworks. For other personal data we carry out an annual audit to establish what is still necessary. Further details on this are available in our retention schedule which is available upon request by contacting us using our details below.

When it is no longer necessary to retain your personal information, we will delete it.

TRANSFERRING YOUR PERSONAL INFORMATION OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA):

These transfers are subject to special rules under European and UK data protection law. We will either obtain your consent to transfer the personal data or we will use standard data protection contract clauses that have been approved by the European Commission.

YOUR RIGHTS

You have the following rights, which you can exercise:

- The right to require us to correct any mistakes in your personal information;
- The right to require us to delete your personal information—in certain situations;
- The right to require us to restrict processing of your personal information—in certain circumstances, for example if you contest the accuracy of the data;
- The right to receive the personal information you provided to us—in certain situations;
- The right to object at any time to your personal information being processed;
- The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

If you would like to exercise any of those rights, please:

- email, call or write to us using our details below;
- complete the form we will then provide to you;
- let us have enough information to identify you (*for example your full name, address and any client matter reference number*);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill) and
- let us know what right you want to exercise and the information to which your request relates.

However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.



PRIVACY POLICY

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures to prevent personal information from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: +44 (0)30 3123 1113.

CHANGES TO THIS PRIVACY NOTICE

We may change this privacy notice from time to time and we will provide you with details of accessing the privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

HOW TO CONTACT US

Please contact us by post, email or telephone if you have any questions about this privacy notice or the information we hold about you.

Our contact details are:

Università Popolare Natura E Cultura

Strada della Perotta 1/A

06131 Perugia Italy

Tel: +39 366 12 91 309

Email: info@upnec.eu



PRIVACY POLICY

I, the undersigned, _____
as an interested party, having read the aforementioned information provided pursuant to
art. 13 GDPR, I give my consent

to process my personal data in accordance with what is indicated in the aforementioned
information and in compliance with the provisions of the GDPR (*)

to use my email address for the purpose of sending the Association's periodic newsletter
(**)

to use my name and surname, my image or videos that are taken on the institutional
website, on social networks (eg Facebook / Instagram / Youtube) and on the Association's
printed information material, for the sole purpose of description and promotion of
institutional activity, in compliance with the provisions of the GDPR and the indications of
the EU Commission and the Guarantor for the Protection of Personal Data (**)

_____, there _____

THE INTERESTED PARTY (legible signature)

(*) The consent to the processing is essential for the execution of the requested service

(**) The consent to the processing is optional.